

## DHEC LabCert Regulation Stakeholder Meeting 5/5/11

### Welcome-Carol Smith

Review of the minutes from the last stakeholder minutes. Minutes will be added to the website. Thanks to Mahtab for doing such a great job on the minutes from our last meeting.

### **Subcommittee Reports**

#### Definitions – Thomasena Simmons

Thomasena gave an update on Definitions subcommittee progress. Basically in holding pattern until other subcommittees are through with their sections. The table includes different colors to indicate the status of a definition.

#### Qualifications and Training Requirement – James Berry

Jamie Berry gave update from the Qualifications subcommittee. Hopefully, this document will be sent out next week to full committee. Shifted Lab Organization section to QA/QC subcomm. Carol talked about analyst, technician terminology as it relates to defining analyst. Also for lab director, e.g., lab manager. Noted that education requirements are shoulds, not musts. Will leave specific qualifications up to the facility, i.e. they will need to be more specific in their quality systems manual concerning their organizational structure and what qualifications they require for certain personnel. Training records must be maintained for all personnel.

It was discussed if approvals for education waivers must come thru the Department. Clarification will be needed on this section to clarify that the Department will not be issuing waivers that it will be up to an organization to document why a waiver was given on training qualifications.

Mahtab discussed that “analyst” may need to be defined by the Definitions subcommittee. Jason agreed with this point. Questions were raised about whether sampling personnel are considered analysts? Susan suggested that the second paragraph of the Lab Analyst/Technician section has QC items that should not be there as it is already defined elsewhere. Carol said to reference the applicable section of the QC document here. Susan highlighted this section on the laptop.

Heather asked where this would fall in the regulation since this may be redundant. Spoke about cross referencing QA section to here. Bennie stated that when whole document is put together it should be easier to see redundant items.

Mahtab asked about knowledge of statistics in QA Officer as a requirement. Carol asked Susan to highlight this term. Leigh said may be too stringent for small labs. Susan asked about use of “shoulds” throughout the document; Carol said it’s a fine line for “should” vs “must”.

Debbie Guerry asked about who does QA manager work, if no QA manager on staff. Discussion of term independent from laboratory management as found in QA Officer language. Mahtab asked if QA manager should be defined in Definitions. Cheryl asked about if someone is over the analysts signing the DMRs, etc that could oversee this. Discussion took place on where the QA Officer qualifications are documented versus the definition of QA Officer. Carol asked if group wants a separate definition for QA Officer. Affirmative response was given. It was asked for email of any additional comments.

#### Quality Systems – Bob Pullano

Bob Pullano defined what should be in the SOP, cross-referenced 4 documents to create a guide. Discussed 12 QA/QC items; cutting and pasting from Wisconsin regulation into our document. Alfred stated that he was working on putting the document together to present it to the group at next meeting. They are still struggling with certain terminology LFB, IDOC, etc. Carol asked about whether lab should define these terms and document which parameters require an IDOC for example pH, DO etc. Nydia spoke about personnel shortage forcing analysts to collect samples, etc. Carol asked if IDOC should be required for parameters in which an IDOC is not specifically required.

#### Data Reporting – Susan Butts

Susan Butts presented a report from the Data Reporting Subcommittee. Data Reporting Acceptance Criteria – Showstoppers, holding times not met; incorrect preservation. Option 1: Not report result to Dept. Option 2: deviations must be flagged and qualified. Option 3: Flagging as in 2, but lab must notify client on the report ask for another sample if possible and notify the Dept. Discussed NC program which is where this terminology came from. Need to look at NC regulation further to investigate follow-up actions taken by the State. Cynde Devlin asked about showstoppers, why does it matter if showstopper is before or after it gets to lab? Discussion about compliance samples- must the COC document this item? Chris Cole said labs should report all anomalies regardless of whether compliance sample or not. Briefly discussed data qualifiers, Susan said all labs can use their own qualifiers but must include a key of qualifiers on the report.

#### Sample Collection/COC - Jason Collins

Jason noted subcommittee had not met since last meeting. Basically ready to wrap up unless comments are sent to subcommittee addressing specific issues. Carol mentioned bottle order form being sent with COC. Discussion of blue ice again. Seems labs do both, some wet ice only, some mixture of blue and wet. Commercial labs often send instructions on how to pack cooler, blue ice, wet ice, etc. FedEx will not deliver samples if coolers are leaking. Are labs cooling down samples prior to shipping? Consensus seems to be that blue, red whatever kind of cooling should be allowed as long as it can maintain required temperatures. Chris said EPA told them to check a representative

sample from a cooler or a temperature blank. Need to develop language for samples collected nearby the lab, do the same temperature requirements apply? A comment was made that the Wisconsin regulation may have appropriate language concerning temperature.

#### Field Parameter - Heather Beard.

Discussed removing “Field Parameter” as a type of laboratory in our database. Noted that all labs no matter what type they are must meet the same certification requirements. Certificates do not specify field parameters from parameters performed in the laboratory. Consensus was ok. Discussed calibrating meters in the certified laboratory the day before and that lab could verify the meter in the field. Residual chlorine was problematic in this regard. Nydia says pocket colorimeters you just verify the meter calibration. Carol mentioned pre-made chlorine standards that are now available. If verifications are not acceptable, you must prepare working standards again, if still unacceptable, then make new stock and try again, if still unacceptable, send meter off for repair. Heather stated that to her there are no differences between pH and residual chlorine as far as calibration goes. Heather mentions that KMnO<sub>4</sub> is carried around in 55 gallon drums for odor control. Therefore, the field use of chlorine standards shouldn’t be a problem. Heather talked about developing guidance documents. Additional discussion is needed on the topic of calibrations performed each work shift and where they can be performed.

#### Wrap-up

Carol handed out an outline of changes to 61-81 that was provided during the first stakeholders meeting.

Carol talked about the overall regulation framework. The regulation must include a reference to fees. We may not use the term “reciprocity” in the new regulation since we do not have reciprocity agreements. Also need to discuss the use of third party auditors and potential enforcement powers of Lab Certification. Next meeting in mid-July will be a meeting of entire original group to put the regulation together. Wednesday July 13 is tentative date for next meeting at EQC Administration.

<b>Stakeholder Committee Members</b>	<b>Laboratory</b>	<b>Attendance</b>
Bob Pullano	GEL	Present
Cheryl Sommers	Commonwealth Labs	Present
Jeff Czarnecki	Greenville Water System	Present
Heather Beard	Richland Co. Utility	Present
Alan Clum	Mount Pleasant Waterworks	Absent (Jestine Dewerd)
Marlene Gillespie	Giant Resource Recovery	Present
Thomasena Simmons	BP Cooper River Plant	Present
Larry McCord	Santee Cooper	Absent (Debbie Guerry)
Jay Kates	Water Systems Inc.	Absent
Jason Collins	Keowee Key Utility	Present
Cheryl Johnson	Pace Analytical	Absent
Raymond Knox	Consultant	Absent

<b>SC DHEC Employees Present</b>	<b>Area</b>	<b>Email Address</b>
Carol Smith	Lab Cert	<a href="mailto:smithcf@dhec.sc.gov">smithcf@dhec.sc.gov</a>
Michael Mattocks	EQC Labs - ARES	<a href="mailto:mattocm@dhec.sc.gov">mattocm@dhec.sc.gov</a>
Chris Doll	BLWM - UST	<a href="mailto:dolles@dhec.sc.gov">dolles@dhec.sc.gov</a>
Leigh Plummer	DHEC Region 4	<a href="mailto:plummelw@dhec.sc.gov">plummelw@dhec.sc.gov</a>
Susan Butts	Lab Cert	<a href="mailto:buttsse@dhec.sc.gov">buttsse@dhec.sc.gov</a>
Mahtab Gowan	Lab Cert	<a href="mailto:gowanmn@dhec.sc.gov">gowanmn@dhec.sc.gov</a>
Crystal Rippy	Bureau of Water	<a href="mailto:rippyd@dhec.sc.gov">rippyd@dhec.sc.gov</a>
Judy Graham	DHEC EQC Labs QA	<a href="mailto:grahamjl@dhec.sc.gov">grahamjl@dhec.sc.gov</a>
Mary Ann Fuller	Bureau of Water	<a href="mailto:fullerma@dhec.sc.gov">fullerma@dhec.sc.gov</a>
Bennie Cockerel	Lab Cert	<a href="mailto:cockerbl@dhec.sc.gov">cockerbl@dhec.sc.gov</a>
Jamie Berry	Lab Cert	<a href="mailto:berryjc@dhec.sc.gov">berryjc@dhec.sc.gov</a>
Nydia Burdick	DHEC EQC Lab QA	<a href="mailto:burdicknf@dhec.sc.gov">burdicknf@dhec.sc.gov</a>
Alfred Baquiran	Lab Cert	<a href="mailto:baquiraj@dhec.sc.gov">baquiraj@dhec.sc.gov</a>
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